

**REMARKS/DISCUSSION OF ISSUES**

Claims 1-15 are pending in the application.

**Once again, the Examiner is respectfully requested to state whether the drawings are acceptable.**

Reexamination and reconsideration are respectfully requested in view of the following Remarks.

**35 U.S.C. § 102**

The Office Action rejects claims 1-15 under 35 U.S.C. § 102(e) over Kasahara et al. U.S. Patent Publication 2002/0036650 ("Kasahara"), and claims 1 and 14 under 35 U.S.C. § 102(e) over Correa et al. U.S. Patent 6,674,429 ("Correa").

Applicants respectfully traverse those rejections for at least the following reasons.

**Correa**

Correa was filed in the United States on 1 August 2001 based on an International (PCT) application filed on 20 January 2000. That is, Correa is "based on [an] international application that [was] filed prior to November 29, 2000" and therefore is "subject to the former (pre-AIPA) version of 35 U.S.C. 102(e) as set forth below.

*Former 35 U.S.C. 102. Conditions for patentability; novelty and loss of right to patent.*

A person shall be entitled to a patent unless -

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(e) the invention was described in a patent granted on an application for patent by another filed in the United States before the invention thereof by the applicant for patent, or on an international application by another who has fulfilled the requirements of paragraphs (1), (2), and (4) of section 371(c) of this title before the invention thereof by the applicant for patent."

M.P.E.P. § 2136 (M.P.E.P. 8<sup>th</sup> Edition, Rev. 3, Aug. 2005, page 2100-100).

So, the effective date of Correa as prior art under 35 U.S.C. 102(e) is the date that the requirements of paragraphs (1), (2), and (4) of section 371(c) were fulfilled. That date is **1 August 2001** (see the cover sheet of the Correa patent).

Meanwhile, the priority date of the present patent application is **20 December 2000**. The present application was originally filed in English, and the English priority document has been earlier submitted to the PTO as acknowledged by the Examiner in the Office Action dated 6 October 2003. So the priority has been perfected.

Therefore, Applicants respectfully submit that the Correa patent is not prior art under 35 U.S.C. § 102(e). Accordingly, Applicants respectfully request that all rejections based on the Correa patent be withdrawn.

### **Kasahara**

#### **Claim 1**

Among other things, the display device of claim 1 includes determining means for comparing the display load (D) of the device with a threshold value (D0), and control means for dynamically varying a number of sub-fields available for display of an image responsive to the display load (D) being below the threshold value (D0).

Applicants respectfully submit that Kasahara does not disclose such a combination of features.

In particular, Kasahara does not disclose any threshold value (D0) or a control means **responsive to any threshold comparison** being satisfied ( $D < D0$ ) before it dynamically varies the number of sub-fields available for display. Instead, in direct contrast, Kasahara discloses a system and method which always dynamically varies the number of sub-fields available for display of an image. There is no threshold. In that regard, once again Applicants note that a threshold is a "minimum requirement for further action, specifically, a determination upon which something else hinges" (Merriam-Webster Dictionary of Law).

Accordingly, for at least these reasons, Applicants respectfully submit that claim

1 is patentable over Kasahara.

Claims 2-13 and 15

Claims 2-13 and 15 depend from claim 1 and are deemed patentable over Kasahara for at least the reasons set forth above with respect to claim 1, and for the following additional reasons.

Claim 2

Among other things, in the device of claim 2, both the subfield converter and the determining means receive an incoming video signal.

The Office Action identifies element 30 in FIG. 9 of Kasahara as supposedly corresponding to the recited determining means, and element 18 as supposedly corresponding to the recited subfield converter. Inspection of FIG. 9 clearly shows that **neither** element 30 nor element 18 receive the incoming video signal (2). Nothing in paragraph 104 of Kasahara - which is cited in the Office Action but which does not even mention element 30 or element 18 - suggests otherwise.

For at least this additional reason, Applicants respectfully submit that claim 2 is patentable over Kojima.

Claims 3 & 5

Among other things, the devices of claims 3 and 5 each include means for applying partial line doubling responsive to the display load being determined to be below a threshold value.

Nothing in Kasahara even suggests such means for applying partial line doubling responsive to the display load being determined to be below a threshold value. In particular, very clearly no such means for applying partial line doubling is disclosed anywhere in paragraph 118 of Kasahara, cited in the Office Action.

For at least this additional reason, Applicants respectfully submit that claims 3 and 5 are each patentable over Kasahara.

Claims 4 & 6

Among other things, the devices of claims 4 and 6 each include means for dithering responsive to the display load being determined to be below a threshold value.

Nothing in Kasahara even suggests such means for dithering responsive to the display load being determined to be below a threshold value. In particular, very clearly no such means for dithering is disclosed anywhere in paragraph 118 of Kasahara, cited in the Office Action

For at least this additional reason, Applicants respectfully submit that claims 4 and 6 are each patentable over Kasahara.

Claims 8-13

Claims 8-13 all variously recite additional features of the claimed devices (e.g., the control means is arranged to operate in accordance with the relationship  $S/L = S0 \times L0$  wherein  $S0$  and  $L0$  are the maximum number of sustain pulses and the maximum luminance at which the maximum display load occurs and  $S$  and  $L$  are the number of sustain pulses and luminance when the display load is determined to be under the threshold value; an idle time resulting from the sustain pulses having a number lower than the maximum number of sustain pulses is present after erase pulses positioned after the sustain pulses; an idle time resulting from the sustain pulses having a number lower than the maximum number of sustain pulses is present between a first and a second portion of the pulses of a subfield; a duplicated subfield is present and the idle time is split between subfields having a same weight; the control means is arranged to operate in accordance with the relationship  $L \times (D + C) = L0 \times (D0 + C)$  where  $L$  and  $L0$  represent luminance values at the time of display load being below the threshold value and at maximum display load,  $C$  is a constant in the order of 0.07 and  $D$  and  $D0$  represent display load values at the time of display load being below the threshold value and at maximum display load; the control means is arranged to introduce hysteresis by increasing the number of subfields at a higher value of the display load compared to the display load at which the number of subfields is reduced to the number of subfields before increasing the number of subfields).

**The Office Action makes absolutely no mention whatsoever of any of these recited features, or even the faintest attempt to identify anything in Kasahara supposedly corresponding to any of these features. It is very clear that none of**

these features are even remotely suggested in paragraphs 124 and 125 of Kasahara, cited in the Office Action.

Applicants have paid all of the appropriate fees to have each of their claims fully, fairly, and independently examined. If the Examiner is unable to cite anything in Kasahara disclosing these various features of claims 8-13, then he is respectfully requested to withdraw the rejections of claims 8-13.

Accordingly, for at least these additional reasons, claims 8-13 are deemed patentable over Kasahara.

Claim 14

Among other things, the method of claim 14 includes comparing the display load of the device with a threshold value, and dynamically varying the number of sub-fields available for display of an image responsive to the display load being determined to be below the threshold value.

As explained above with respect to claim 1, Kasahara does not disclose any method including such a combination of features. In particular, Kasahara does not disclose the threshold value or dynamically varying the number of sub-fields being responsive to the display load being less than the threshold value ( $D < D_0$ ).

Accordingly, for at least these reasons, Applicants respectfully submit that claim 14 is patentable over Kasahara.

**CONCLUSION**


In view of the foregoing explanations, Applicants respectfully requests that the Examiner reconsider and reexamine the present application, allow claims 1-15 and pass the application to issue. In the event that there are any outstanding matters remaining in the present application, the Examiner is invited to contact Kenneth D. Springer (Reg. No. 39,843) at (571) 283.0720 to discuss these matters.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies to charge payment or credit any overpayment (except for the issue fee) to Deposit Account No. 50-0238 for any additional fees required under 37 C.F.R. § 1.16 or under 37 C.F.R. § 1.17, particularly extension of time fees.

Respectfully submitted,

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